ALSTON&BIRD LLP

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

404-881-7000
Fax:404-881-7777
www.alston.com

Lee A. DeHihns, III **Direct Dial: 404-881-7151** **E-mail: lee.dehihns@alston.com**

November 5, 2009

BY COURIER

Gail Mitchell, Deputy Director
Water Protection Division
U.S. EPA Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: October 6, 2009, Information Request – Section 308 of the Clean Water Act - Dalton Utilities Land Application System

Dear Ms. Mitchell:

Enclosed with this letter is information from Dalton Utilities in response to EPA's October 6, 2009, Section 308 of the Clean Water Act request (the "Request") addressed to Mr. Don Cope, President and CEO of Dalton Utilities. The enclosures include two letters both dated November 2, 2009, with certifications signed pursuant to the Request and information responsive to Paragraph 3 of Enclosure A, **Composted Biosolids Monitoring Plan** and Paragraph 4 of Enclosure A, **Compost Use Review Report**.

Please contact me if have any questions regarding the information supplied pursuant to the Request.

Sincerely,

Lee A. DeHihns, III

LAD:gba
Enclosures

LEGAL02/31578197v4

Dalton
UTILITIES

November 2, 2009

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Compost Use Review Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting to EPA for review and approval the Compost Use Review Report (see Attachment A).

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Don Cope
President & CEO

Attachment

c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Dalton Utilities

Compost Use Review Report
and
Sampling Protocol

October 2009

Table of Contents

Executive Summary

Dalton Utilities, located in Dalton, Georgia, operates water treatment, wastewater treatment, natural gas, electric, and telecommunication systems that serve residents in the City of Dalton in addition to residents in Whitfield, Murray, Gordon, and Catoosa Counties.

Dalton Utilities wastewater operations is comprised of approximately 295 miles of pipe, 5,544 manholes, and 35 lift stations in the wastewater collection system, five wastewater treatment facilities, and 9,800 Land Application System (LAS). The largest three wastewater treatment plants (WWTP), Abutment WWTP, Riverbend WWTP, and Loopers WWTP are part of Dalton Utilities Land Application System (LAS) which is a non-discharging system.

These three WWTPs take wastewater from local industries and the residents of the City of Dalton and parts of Whitfield County and process the wastewater utilizing biological treatment. The treated wastewater or effluent is then transported to the canal or reservoir located at the LAS. The effluent flows through the canal system to the pump stations where the effluent is chlorinated and then pumped to various sprayfields. The effluent is distributed via underground piping and sprayed using impact sprinklers onto the land where the effluent infiltrates the soil surface and subsurface providing additional treatment.

In May 2009, Dalton Utilities collected samples at various locations on the LAS for the analyses of perfluoridated chemicals (PFCs). In response to these sample results, Dalton Utilities began investigating its operations and specifically, the composting operation and subsequent distribution of finished compost.

This protocol is to be followed for the sampling of locations where Dalton Utilities compost was applied and sampling of private wells located in the nearby vicinity of where the compost was applied. After collection, the samples will be analyzed by a contract laboratory to determine the levels of perfluoridated chemicals (PFCs) present in the compost amended soil.

Dalton Utilities Compost Application Site Sampling Protocol

1. Identification of Sample Locations

   Biosolids are generated as part of the wastewater treatment process. The biosolids generated by Dalton Utilities are transported to an on-site biosolids handling facility where the biosolids are dewatered via centrifuges and then mixed with wood waste to achieve the desired consistency and carbon to nitrogen ratio for composting. The resulting compost is stored on-site in static piles and continues to cure until it is ready to be screened. It is then sold or given away through a third party agreement.

   Every shipment of finished compost that leaves the site is accompanied by a manifest which lists the company or individual transporting the compost. The manifests are made in triplicate, and a copy is retained by Dalton Utilities for recordkeeping purposes. An example manifest is attached herein as Attachment A.

   The information from the manifests was compiled to create a list of recipients of compost based on the available information. The lists of companies and individual recipients are attached herein as Attachments B and C, respectively. This information was utilized to determine the appropriate sample locations and number of locations to be sampled as part of this protocol.

   All of the companies and individuals for which Dalton Utilities had sufficient contact information shown in Attachments B and C, respectively, were contacted to obtain additional information on the use of the compost received per the manifests. As most companies contacted further distributed the compost in a retail situation, it was determined that finding appropriate sites to sample for this compost would be impractical.

   The individuals listed in Attachment C, however, were found to have utilized the compost as soil amendments on their own properties. These recipients were selected for study as part of this sampling protocol.

   As this sampling event is intended to measure the potential impacts of compost applications to soil, only the larger volume recipients (those obtaining equal to or greater than 10,000 pounds) or ones found to utilize a private drinking water well from Attachment C were chosen for sampling (see Attachment D for a complete list). These recipients will be contacted, permission to conduct the sampling obtained, and the sampling event scheduled.

2. Sample Collection

Dalton Utilities will collect the soil samples from the location where the compost was applied per the information obtained from the recipient and after obtaining permission from the recipient. The sampling will be performed by qualified personnel with experience in the field and be conducted in accordance with Region 4 of the United States Environmental Protection Division (EPA) Science and Ecosystem Support Division's Soil Sampling Procedure (SESDPROC-300-R1) and in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

The sample collection will be conducted as follows:

a. The sampling area to be representative of where the compost was applied as a soil amendment will be identified in the field through the information obtained from the recipient. The sampling area will not exceed one acre.
b. A composite soil sample consisting of five equal aliquots at depths of 0 to 3 inches or as appropriate depending on the application of the compost (i.e. tilled into soil or applied as top dressing). The composite sample will be collected utilizing a 5-point location (center, north, south, east, and west) of the identified sample area will be collected manually utilizing a stainless steel spoon and/or small hand shovel. Any humus or roots present at or near the surface will be removed prior to the sample collection. The final depth of the sample will be recorded.
c. The individual aliquots will be placed together in a stainless steel bowl and stirred utilizing the stainless steel spoon to homogenize the sample. To allow for adequate sample mixing, the sample will be stirred in a circular manner, reversing direction, and turning the sample material over occasionally.
d. After adequate mixing, the sample will be placed in the appropriate container provided to Dalton Utilities by the contract laboratory and labeled as to the location of the sample collection.
e. The sample container will then be placed on ice in a cooler to be transported to the contract laboratory for analyses.
f. Latitudes and longitudes, as collected using Global Positioning System (GPS) equipment, will also be obtained for each sample site.
g. Any available information on the soil type will be obtained and recorded
h. A field sketch will be prepared showing the locations on the property where compost was applied, where samples were collected, and other potential features of interest including private wells, vegetable gardens, etc.
i. All instrumentation utilized in the sample collection will be decontaminated in accordance with the draft procedures outlined in the US EPA Region 4 Science and Ecosystem Division's Recommended Decontamination Procedure of Equipment used for Sample Collection for Perfluorinated Compound Analysis dated September 8, 2009, in between the sample collections. The decontamination process will be conducted as follows:

i. All instrumentation utilized in the sample collection will be cleaned with Alconox and water.
ii. Following cleaning, the equipment will be rinsed with tap water and then de-ionized water.
iii. As this procedure is to be conducted in the field and not in a controlled laboratory with a chemical fume hood, isopropyl alcohol will be used in lieu of methanol to triple rinse the equipment after the de-ionized water rinse. The appropriate documentation to demonstrate the effectiveness of this substitution will be maintained.
iv. The equipment will then be placed on a clean surface and allowed to air dry or be properly stored.

3. Locations with Private Drinking Water Well

If it is determined through Dalton Utilities' investigation of compost usage that the recipient utilizes a private well as the residence's primary source of drinking water, the well will also be sampled pending permission from the resident. The private drinking water well samples will be collected in accordance with the EPA's Standard Operating Procedure for Potable Water Supply Sampling, SESDPROC-305-R1.

The sample collection will be conducted as follows:

a. The sample will be collected at the first available tap closest to the private well. Any hoses, filters, or aerators will be disconnected before the sample collection.
b. The tap will be purged or flushed for approximately 15 minutes or until the pH, temperature, and specific conductance have stabilized and/or the turbidity is below 10 Nephelometric Turbidity Units (NTU).
c. The sample will be collected in the sampling container provided by the contract laboratory and the field parameters as well as GPS coordinates of the well will be recorded.
d. The sample container will then be appropriately labeled as to the location of the sample collection and the sample placed on ice in a cooler to be transported to the contract laboratory for analyses.

4. Background Samples

Background or control samples will also be collected in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. Two control samples will be collected close to but not a part of the sample areas where the compost was utilized. Every effort will be made to ensure the control samples are also collected from the same soil type as the compost application sample locations.

5. Sample Identification, Labeling, Chain of Custody, and Recordkeeping

For simplicity, the sample containers will be labeled appropriately as to the location where the sample was collected. Duplicate samples will be labeled as duplicate and records will be maintained by Dalton Utilities to illustrate which locations were duplicated.

The sample container labels will correspond directly with the Chain of Custody. The individual collecting the sample will fill out the Chain of Custody appropriately and relinquish the samples to the contract laboratory via the signature on the Chain of Custody. An example Chain of Custody is attached herein as Attachment E.

All records pertaining to this project will be maintained by Dalton Utilities.

6. Quality Control

Duplicate samples will be collected at a frequency of 10% of the total number of samples as part of this project. Field blanks, trip blanks, and equipment blanks will be collected and analyzed as well at a lesser frequency (approximately 5%). Quality control of the laboratory analyses will be conducted in accordance with the contract laboratory's QC program and procedures and will include laboratory duplicates and matrix spikes.

7. Shipment of Samples

The samples will be placed in the appropriately labeled containers with the completed Chain of Custody and shipped in an insulated container with ice via an overnight courier to the contact laboratory for analyses.

8. Sample Analyses

The samples collected as a part of this study will be analyzed for the list of compounds indicated in Attachment F. At the time of the development of this protocol, the selected contract laboratory did not have standards and/or validated methods developed for the additional perfluoridated chemicals (PFCs) noted in the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. As such, the list of compounds indicated in Attachment F reflects the full current analytical capabilities of the contract laboratory with respect to PFCs.

The concentrations of these chemicals will be determined utilizing the contract laboratory's method for analyses. The method will be provided to Dalton Utilities by the contract laboratory in the subsequent analytical report.

9. Schedule

The sampling events delineated herein will be completed no later than 180 days and initiated no later than 30 days after Dalton Utilities receives EPA's approval of this report.

10. Reporting

The analytical report for this project will be provided to Dalton Utilities upon completion and verification of the analyses by the contract laboratory. Dalton Utilities will submit the analytical sample results to EPA within 5 days of receipt of the final analytical report in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. Additionally, a full report including all analytical results will be provided to EPA once all the final analytical results are received.

Manifest # **09** -____ Date _____

Compost Manifest

Transporter Information:

Company Name_____ **Phone No.**_____

Company Address_____

Driver Name_____ **Truck No.**_____

Tag No._____

Dry Bulk Pounds Hauled Offsite _____

Driver Signature _____

Dalton Utilities Signature _____

Dalton
UTILITIES
1200 V.D. Parrott Jr. Parkway
Dalton, GA 30722

The annual application rate for this product is not to exceed
474,000 lbs. per acre per year.

Note:	**Application of this compost to the land is prohibited except in accordance with these instructions and any requirements set forth by the Georgia Department of Agriculture.**

White: Dalton Utilities **Yellow: Driver** **Pink: Customer**

Compost Manifest Log - Users Greater than 2,000,000 pounds

Transporter Name	Transported To	General Uses	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Autry Farms (hauling service)			352 West Watts Rd	Ringgold	GA	30736	14,656,000	9/30/05 - 6/11/09
	Beaty Fertilizer & Chemical Company	Nursery/Landscape supplier - sold as retail - Does not have individual records of who the compost was sold to.	PO Box 2516	Cleveland	TN	37320	5,250,000	
	Hwy 71 Landscaping & Supply Co.	Landscape supplier - sold compost to homeowners and landscape contractors.	3440 Cleveland Hwy	Dalton	GA	30720	1,100,000	
	Pro Lawn	Landscape supplier - sold compost to homeowners and landscape contractors.	1101 Mackey Avenue	Chattanooga	TN	37421	1,550,000	
	Show Place Homes	Used in construction of homes - no known wells	Unknown				900,000	
	Turf Master Supply	Unknown	Unknown				800,000	
	Ooltewah Nursery	Unknown	Unknown				550,000	
	Reed Group	Used in construction of homes - no known wells	Unknown				350,000	
	Redwood Hill	Unknown	Unknown				250,000	
	E H Landscaping	Unknown	Unknown				250,000	
	Circle H Garden Center	Unknown	Unknown				250,000	
	Kreed Construction	Top dressing new lawns	Unknown				200,000	
	Rodney Laurance	Individual used in yard landscaping - no wells	Unknown				150,000	
	Randy Wilhoit	Mixed with chicken litter and used as soil admendment	Unknown				100,000	
	Croxall	Unknown	Unknown				100,000	
	Windwood Bulk Co.	Landscape supplier - sold in bulk as retail	Unknown				100,000	
	W D Scott Co.	Landscape supplier - sold in bulk as retail	Unknown				100,000	
	Chatsworth Farm & Garden Supply	Sold in bulk as retail	624 N 4th Avenue	Chatsworth	GA		50,000	
	David Wright	Unknown	Unknown				50,000	
	Fine View Soils	Mixed with other soil and sold as bulk retail	Unknown				50,000	
	Frand Reed	Individual used in yard landscaping - no known wells	Unknown				50,000	
	GreenScapes of Chattanooga	Landscape supplier - sold in bulk as retail	Unknown				50,000	
	Harold Parrish	Individual used in yard landscaping - no known wells	Unknown				50,000	
	Hayduk Landscaping	Unknown	Unknown				50,000	
	John Gordy	Individual used in yard landscaping - no known wells	Unknown				50,000	
	John Snodgrass	Individual used in yard landscaping - no known wells	Unknown				50,000	
	Landscape Supply	Unknown	Unknown				50,000	
	Mountain Crest Landscape	Unknown	Unknown				50,000	
	Sandra Self	Individual used in yard landscaping - no known wells	Unknown				50,000	
	Tony Autry	Individual used in yard landscaping - no known wells	Unknown				50,000	
	Delivered to individuals.	No records					2,006,000	
Beaty Fertilizer & Chemical Company		Nursery/Landscape supplier - sold as retail - Does not have individual records.	PO Box 2516	Cleveland	TN	37320	3,214,000	11/15/05 - 5/29/09
Circle H Trucking		Bagged product shipped to home centers and sold as retail	746 River Street	Elijay	GA	30540	5,811,000	2/23/05 - 6/3/09

Compost Manifest Log - Users Greater than 2,000,000 pounds

Transporter Name	Transported To	General Uses	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Harvest Farms		Bagged product shipped to home centers and sold as retail	PO Box 40	Harrison	TN	37341	2,152,800	1/7/05 - 10/31/05
Jerrys Hauling		Yard landscape projects	Unknown				2,348,000	4/24/06 - 10/14/06
John Deere Landscaping		Landscape/Nursery supplier - sold to individuals, builders, landscape contractors for use in flower beds, around shrubs and trees. Did not sell for use on lawns. Individual records are business confidential.	650 Stephenson Hwy	Troy	MI	48083	2,450,000	3/31/06 - 10/22/06
Patterson Services		Mixed compost with 80% soil and sold to landscapers and contractors - did not keep individual records on where the compost was used.	5800 Riverview Road	Mableton	GA	30126	8,867,000	12/16/05 - 3/28/06
Shephard Mulch		Landscape supplier - sold as retail to homeowners and landscapers. Has no records of who it was sold to.	117 Roundnob Drive	Rocky Face	GA	30740	2,895,000	12/18/06 - 3/19/09
Lamar Shephard		Landscape supplier - sold as retail to homeowners and lansdcapers. Sold only for use on lawns and around trees. Does not have any individual records of who the compost was sold to.	695 1/2 N Varnell Rd	Tunnel Hill	GA		8,602,000	2/1/06 - 6/30/09
Weedon Trucking		Lawn landscaping suppliers - sold as retail.	317 Bells Ferry Rd.	Rome	GA		3,330,000	11/2/05 - 5/20/09

Compost Manifest Log - Individual Users

	Uses	On a Well for Drinking Water?	Street Address	City	State	Zip Code	Total Weight	Date(s) Hauled Off Site
Betty Ann Clark			812 Atkinson Dr.	Dalton	GA	30720	1,100	4/29/09 - 4/30/09
Bianca Archuleta			107 E. Plantation St.	Chatsworth	GA	30705	1,000	3/23/09 - 4/6/09
Bill Mckenney	Flower beds, tilled in soil	No	1 Boys Mtn. Road	Ringgold	GA	30736	500	4/9/2009
Bill Russel							1,000	5/9/2005
Brent Dean							1,000	3/13/2008
Caleb Martin	Flower beds and vegetable garden, tilled in soil	No	241 Southern Circle	Chatsworth	GA	30705	500	4/2/2005
Carl Mashburn			2216 Decatur Pike	Athens	TN	37303		
Chad Garrison	Lawn, top dressed	No	1549 Dawnville Road	Dalton	GA	30721	10,000	2/24/2007
Chris Owens	Vegetable garden, tilled in soil	No	396 Dr Johnson Rd.	Crandall	GA	30711	9,060	1/25/07 - 3/9/07
Cims			North Goose Hill Lane	Rocky Face	GA	30740	1,000	4/24/2009
Dalton Utilities							1,774,300	6/8/05 - 6/30/09
Dan Findley	Flower beds, tilled in soil	No	449 Scarlett Dr	Dalton	GA	30721	1,000	4/20/2005
Darryl Williams	Lawn, top dressed	No	580 Reed Rd.	Dalton	GA	30720	5,500	3/22/08 - 4/18/09
David White/D.U.	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	1141 County Line Road	Resacca	GA	30735	2,000	2/13/2009
Don Cope	Flowers and vegetable containers	No	155 Enoch Trail	Rocky Face	GA	30740	150	
Donald Akers			4068 Keith valley Rd.	Cohutta	GA	30710	7,200	2/24/2006
Dr Hodges							430,000	9/24/08 - 10/28/08
Frank Kovach			910 Beaverdale Rd.	Dalton	GA	30721	1,000	6/6/09 - 6/8/09
Gary Hill	Lawn, tilled in soil	Yes	PO Box 342	Oakman	GA	30732	500	6/16/2009
Heath Brewster							5,000	3/23/2009
Individual (no names)							1,930,330	3/25/05 - 10/4/07
James Wilson	Vegetable garden and flowers, tilled in soil	No	3006 Davis Rd.	Rocky Face	GA	30740	126,000	1/15/2008
Jason Coleman	Lawn, top dressed	No					5,000	5/26/07 - 10/31/08
Jason Garland	Vegetable garden, tilled in soil	No	416 Hasty Drive	Tunnel Hill	GA	30755	200	4/24/2009
Jeff Cobb							28,800	2/2/2006
Jeff Fountian			2341 Gail Lane				3,600	3/9/2006
Jeff McNeely	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	3158 Morris Rd.	Rocky Face	GA	30740	20,000	4/29/05 - 6/10/07
Jenifer							1,000	4/9/2005

Compost Manifest Log - Individual Users

	Uses	On a Well for Drinking Water?	Street Address	City	State	Zip Code	Total Weight	Date(s) Hauled Off Site
Jeremy Peden	Lawn - top dressed, vegetable garden - tilled in soil	No	34 Stone Brook Path	Chatsworth	GA	30705	48,500	10/11/06 - 4/26/09
Joe Stevens	Vegetable garden, tilled in soil	No	532 Wooten Rd.	Ringgold	GA	30736	700	3/6/2005
Joe Woody	Vegetable garden, tilled in soil	Yes	454 Jim Petty Rd.	Crandall	GA	30711	1,000	4/29/2005
John Burgess	Lawn, top dressed	No	624 Pine Oak Dr.				40,500	6/5/07 - 4/16/09
Johnny Davenport	Lawn, top dressed	No	3451 Cleveland Hwy	Dalton	GA	30721	267,000	6/1/06 - 6/8/06
Juan Montez			PO Box 236	Tunnel Hill	GA	30755	30,000	3/21/2009
Ken Finch	Flower beds, tilled in soil	No	2417 Shahan Dr.	Dalton	GA	30705	4,500	4/7/05 - 4/9/05
Ken Helton	Lawn, top dressed	No	3180 Helton Rd.	Rocky Face	GA	30740	1,000	2/18/2008
Larry Patton							50,750	4/5/07 - 4/29/08
Louis Dykes	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	145 Sahara Lane	Chatsworth	GA	30705	3,000	10/3/06 - 5/23/08
Marion Bryant			498 Palomino Drive	Dalton	GA	30720	1,500	4/9/09 - 5/13/09
Mark Hall	Lawn - top dressed, vegetable garden - tilled in soil	No	2742 Old Tilton Rd.	Dalton	GA	30720	1,000	3/4/2008
Mathew Warner	Vegetable garden, tilled in soil	No	194 Cotton Circle	Chatsworth	GA	30705	1,000	4/13/2005
McDaniel, Lori	Lawn, top dressed	No	1975 Highway 52E	Chatsworth	GA	30705	100,000	2/16/2006
Mickey Sisk			484 McCamy Rd	Chatsworth	GA	30705	42,500	10/18/06 - 3/25/07
Mike Croxall							2,000	5/27/08 - 5/28/08
Mike Marris							50,000	10/17/2008
Pat Camp							800	6/1/2007
Patsy Gordon			301 Nob North		GA		500	1/26/2009
Phillip H. Pheifer	Lawn, top dressed	No	41 Promise Heights Drive	Ringgold	GA	30736	525	4/2/09 - 5/22/09
Ralph England			PO Box 2095	Chatsworth	GA	30705	500	7/24/2005
Ray Sexton			923 Morgan Dr.	Tunnel Hill	GA	30755	1,500	9/26/08 - 4/16/09
Richard Dodson	Applied around trees	No	5460 Fredrick Rd.	Cohutta	GA	30710	500	4/20/2005
Robert Deforest	Lawn, top dressed	No	41 Promise Heights Drive	Ringgold	GA	30736	1,000	4/29/09 - 5/19/09
Robert Ledford	Flower beds, tilled in soil and top dressed	Yes	208 Mountain Trail	Lafayette	GA	30728	1,000	2/19/05 - 4/23/09
Rod Hensley			746 River Street	Ellijay	GA	30540	324,000	10/18/07 - 3/22/09
Russell Witherow			298 Katie Lane	Chatsworth	GA	30705	500	4/17/2009

Compost Manifest Log - Individual Users

	Uses	On a Well for Drinking Water?	Street Address	City	State	Zip Code	Total Weight	Date(s) Hauled Off Site
Sid Abernathy			1504 Elaine Way	Dalton	GA	30720	1,000	4/27/09 - 5/15/09
Dustin Sharp			143 Ladd Springs	Cleveland	TN	37323	500	10/31/2008
Steve Bailey	Vegetable garden, top dressed	No	3906 Parker Rd.	Dalton	GA	30721	1,800	3/11/2007
Steve Bolles							200,000	4/7/08 - 4/28/08
Steve Bratton	Lawn and vegetable garden, top dressed	No	484 Bethany Rd.	Dalton	GA	30721	500	4/22/2009
Steve Thompson			1038 Jayis Way	Ringgold	GA	30736	100,000	3/20/07 - 3/27/07
Sue Dale	Lawn and Flower beds, top dressed	No	166 Skylark Dr.	Chatsworth	GA	30705	500	3/20/2009
Terry Earley	Lawn, top dressed	Yes	1095 Houston valley Rd.	Rocky Face	GA	30740	14,750	3/29/06 - 5/15/09
Terry Moody	Flower beds, top dressed	No	325 Woodbranch Dr.	Dalton	GA	30721	1,300	3/27/06 - 3/13/08
Tim Alexander							1,000	6/12/2006
Tim Jones							30,000	6/4/2007
Todd Hensley			5397 Willbanks Rd.	Chatsworth	GA	30705	1,000	3/19/2009
Tony Dale	Lawn and Flower beds, top dressed	No	166 Skylark Dr.	Chatsworth	GA	30705	3,500	3/13/09 - 3/23/09
Wade Hart	Lawn and Flower beds, top dressed	No	30 Arrowhead Dr.	Chatsworth	GA	30705	2,000	3/3/2005
Wally Babb			702 Furnance Creek	Lafayette	GA	30728	500	3/3/2005
William Earley	Lawn, top dressed, vegetable garden and flowerbeds tilled in	No	55 South Lake Dr.	Chatsworth	GA	30705	125,800	3/5/05 - 3/3/08
							5,826,665	

Sample Locations

	Uses	On a Well for Drinking Water?	Street Address	City	State	Zip Code	Total Weight (lbs)	Date(s) Hauled Off Site
Chad Garrison	Lawn, top dressed	No	1549 Dawnville Road	Dalton	GA	30721	10,000	2/24/2007
Dr Hodges							430,000	9/24/08 - 10/28/08
Gary Hill	Lawn, tilled in soil	Yes	PO Box 342	Oakman	GA	30732	500	6/16/2009
James Wilson	Vegetable garden and flowers, tilled in soil	No	3006 Davis Rd.	Rocky Face	GA	30740	126,000	1/15/2008
Jeff Cobb							28,800	2/2/2006
Jeff McNeely	Lawn - top dressed, flowers, vegetable garden - tilled in soil	No	3158 Morris Rd.	Rocky Face	GA	30740	20,000	4/29/05 - 6/10/07
Jeremy Peden	Lawn - top dressed, vegetable garden - tilled in soil	No	34 Stone Brook Path	Chatsworth	GA	30705	48,500	10/11/06 - 4/26/09
Joe Woody	Vegetable garden, tilled in soil	Yes	454 Jim Petty Rd.	Crandall	GA	30711	1,000	4/29/2005
John Burgess	Lawn, top dressed	No	624 Pine Oak Dr.				40,500	6/5/07 - 4/16/09
Johnny Davenport	Lawn, top dressed	No	3451 Cleveland Hwy	Dalton	GA	30721	267,000	6/1/06 - 6/8/06
Juan Montez			PO Box 236	Tunnel Hill	GA	30755	30,000	3/21/2009
Larry Patton							50,750	4/5/07 - 4/29/08
McDaniel, Lori	Lawn, top dressed	No	1975 Highway 52E	Chatsworth	GA	30705	100,000	2/16/2006
Mickey Sisk			484 McCamy Rd	Chatsworth	GA	30705	42,500	10/18/06 - 3/25/07
Mike Marris							50,000	10/17/2008
Robert Ledford	Flower beds, tilled in soil and top dressed	Yes	208 Mountain Trail	Lafayette	GA	30728	1,000	2/19/05 - 4/23/09
Rod Hensley			746 River Street	Ellijay	GA	30540	324,000	10/18/07 - 3/22/09
Steve Bolles							200,000	4/7/08 - 4/28/08
Steve Thompson			1038 Jayis Way	Ringgold	GA	30736	100,000	3/20/07 - 3/27/07
Terry Earley	Lawn, top dressed	Yes	1095 Houston valley Rd.	Rocky Face	GA	30740	14,750	3/29/06 - 5/15/09
Tim Jones							30,000	6/4/2007
William Earley	Lawn, top dressed, vegetable garden and flowerbeds tilled in	No	55 South Lake Dr.	Chatsworth	GA	30705	125,800	3/5/05 - 3/3/08

Attachment D

Chain of Custody Record

Sampler ID _____

Temperature on Receipt _____

Drinking Water? Yes ☐ No ☐

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TAL-4124-280 (1007)

Attachment A to November 2, 2009, letter to Ms. Mitchell

Client: Client Name	Project Manager: Your Field Rep or Project Manager	Date: Date of Sampling	Chain of Custody Number: 104321
Address: Client Address	Telephone Number (Area Code)/Fax Number: Same AS Above	Lab Number	Page _____ of _____
City / State / Zip Code	Site Contact	Lab Contact: Your T.A. Project MGR	Analysis (Attach list if more space is needed)
Project Name and Location (State): ABC Landfill - Denver, CO	Carrier/Waybill Number		
Contract/Purchase Order/Quote No.: Quote # 12345			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H_2SO_4	HNO_3	HCl	NaOH	ZnAc/NaOH	BOD	TSS, TDS	Oil & Grease	total Metals	8260 Voa	Cyanide	Sulfide	Flash point	% Moisture	Special Instructions/ Conditions of Receipt
MW-1	8/20/08	0930		X			3	2	1	3	1	1	X	X	X	X	X	X	X			★ Any Special Information you may want the Lab to know
MW-2	8/20/08	1055		X					1	3						X	X					
MW-3	8/20/08	1345				X	3									X	X			X	X	
																						Example: -MS/MSD -High in PCBs -Limited Volume

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months
(A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☒ Other STD

QC Requirements (Specify)

	Date	Time		Date	Time
1. Relinquished By: Sign Here to Identify Sample Transfer			1. Received By: We Sign Here upon Arrival		
2. Relinquished By			2. Received By		
3. Relinquished By			3. Received By		

Comments: Shipped VIA FEDEX Priority Overnight

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Attachment F
List of Perfluoridated Compounds (PFC) for Chemical Analyses

As Revised June 17, 2009, by EPA

Compound	Acronym
Perfluorobutanoic acid	C4
Perfluoropentanoic acid	C5
Perfluorohexanoic acid	C6
Perfluoroheptanoic acid	C7
Perfluorooctanoic acid	C8
Perfluorononanoic acid	C9
Perfluorodecanoic acid	C10
Perfluoroundecanoic acid	C11
Perfluorododecanoic acid	C12
Perfluorotridecanoic acid	C13
Perfluorotetradecanoic acid	C14
Perfluorobutane sulfonate	PFBS
Perfluorohexane sulfonate	PFHxS
Perfluorooctane sulfonate	PFOS
Perfluoroctane sulfonamide	PFOSA

Dalton
UTILITIES

November 2, 2009

Ms. Gail Mitchell, Deputy Director
Clean Water Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, SW
Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act
Composted Biosolids Monitoring Plan

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting to EPA for review and approval the Composted Biosolids Monitoring Plan (see Attachment A).

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false

information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Don Cope
President & CEO

Attachment

c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural Resources (cover letter only)
Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only)
Lee A. DeHihns, Esq.

Dalton Utilities

Composted Biosolids Monitoring Plan and Sampling Protocol

October 2009

Table of Contents

Executive Summary

Dalton Utilities, located in Dalton, Georgia, operates water treatment, wastewater treatment, natural gas, electric, and telecommunication systems that serve residents in the City of Dalton in addition to residents in Whitfield, Murray, Gordon, and Catoosa Counties.

Dalton Utilities wastewater operations is comprised of approximately 295 miles of pipe, 5,544 manholes, and 35 lift stations in the wastewater collection system, five wastewater treatment facilities, and 9,800 Land Application System (LAS). The largest three wastewater treatment plants (WWTP), Abutment WWTP, Riverbend WWTP, and Loopers WWTP are part of Dalton Utilities Land Application System (LAS) which is a non-discharging system.

These three WWTPs take wastewater from local industries and the residents of the City of Dalton and parts of Whitfield County and process the wastewater utilizing biological treatment. The treated wastewater or effluent is then transported to the canal or reservoir located at the LAS. The effluent flows through the canal system to the pump stations where the effluent is chlorinated and then pumped to various sprayfields. The effluent is distributed via underground piping and sprayed using impact sprinklers onto the land where the effluent infiltrates the soil surface and subsurface providing additional treatment.

In May 2009, Dalton Utilities collected samples at various locations on the LAS for the analyses of perfluoridated chemicals (PFCs). In response to these sample results, Dalton Utilities began investigating its operations and specifically, the composting operation and subsequent distribution of finished compost.

This protocol is to be followed for the sampling of Dalton Utilities on-site inventory of compost denoted in Dalton Utilities August 5, 2009, correspondence to Mr. Mike Hom, US EPA. At the time of that correspondence, the compost inventory on-site had aged approximately six (6), twelve (12), and eighteen (18) months. After collection, the samples will be analyzed by a contract laboratory to determine the levels of perfluoridated chemicals (PFCs) present in the compost.

Dalton Utilities Biosolids Monitoring Sampling Protocol

1. Identification of Sample Locations

   Biosolids are generated as part of the wastewater treatment process. The biosolids generated by Dalton Utilities are transported to an on-site biosolids handling facility where the biosolids are dewatered via centrifuges and then mixed with wood waste to achieve the desired consistency and carbon to nitrogen ratio for composting. The resulting compost is stored on-site in static piles and continues to cure until it is ready to be screened. It is then sold or given away through a third party agreement.

   The on-site inventory of compost was segregated in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. All the compost noted to be aged approximately 6, 12, and 18 months in Dalton Utilities August 5, 2009, correspondence to Mr. Mike Hom, US EPA, has been segregated into separate locations. Each of the three groups of different age compost has been selected to be sampled.

2. Sample Collection

   Dalton Utilities will collect the compost samples from each of the three different aged lots of compost. The sampling will be performed by qualified personnel with experience in the field and be conducted in accordance with Region 4 of the United States Environmental Protection Division (EPA) Science and Ecosystem Support Division's Soil Sampling Procedure (SESDPROC-300-R1) and in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

   Two samples of the three different aged lots on-site will be sampled three (3) times at four (4) month intervals. If the inventory of compost is thermally treated in a manner as to reduce the potential impact of PFCs to a level below the published health advisory as demonstrated through a modified Toxicity Characteristic Leaching Potential (TCLP) test, the treated compost would be excluded from this protocol.

   The sample collection will be conducted as follows:

   a. A composite sample consisting of five equal aliquots at depths of 0 to 3 inches will be collected utilizing a 5-point location (center, north, south, east, and west) of the identified sample area. The sub-samples will be collected manually utilizing a stainless steel spoon and/or small hand shovel. Any humus or roots present at or near the surface will be removed

prior to the sample collection although this material is unlikely to be present on the compost piles.

b. The individual aliquots or sub-samples will be placed together in a stainless steel bowl and stirred utilizing the stainless steel spoon to homogenize the sample. To allow for adequate sample mixing, the sample will be stirred in a circular manner, reversing direction, and turning the sample material over occasionally.
c. After adequate mixing, the sample will be placed in the appropriate container provided to Dalton Utilities by the contract laboratory and labeled as to the location of the sample collection.
d. The sample container will then be placed on ice in a cooler to be transported to the contract laboratory for analyses.
e. Latitudes and longitudes, as collected using Global Positioning System (GPS) equipment, will be obtained for the sample location.
f. All instrumentation utilized in the sample collection will be decontaminated in accordance with the draft procedures outlined in the US EPA Region 4 Science and Ecosystem Division's Recommended Decontamination Procedure of Equipment used for Sample Collection for Perfluorinated Compound Analysis dated September 8, 2009, in between the sample collections. The decontamination process will be conducted as follows:
    i. All instrumentation utilized in the sample collection will be cleaned with Alconox and water.
    ii. Following cleaning, the equipment will be rinsed with tap water and then de-ionized water.
    iii. As this procedure is to be conducted in the field and not in a controlled laboratory with a chemical fume hood, isopropyl alcohol will be used in lieu of methanol to triple rinse the equipment after the de-ionized water rinse. The appropriate documentation to demonstrate the effectiveness of this substitution will be maintained.
    iv. The equipment will then be placed on a clean surface and allowed to air dry or be properly stored.

3. Sample Identification, Labeling, Chain of Custody, and Recordkeeping

For simplicity, the sample containers will be labeled appropriately as to the location where the sample was collected.

The sample container labels will correspond directly with the Chain of Custody. The individual collecting the sample will fill out the Chain of Custody appropriately and relinquish the samples to the contract laboratory via the signature on the Chain of Custody. An example Chain of Custody is attached herein as Attachment A.

All records pertaining to this project will be maintained by Dalton Utilities.

4. Quality Control

As two samples of each location will be collected as part of this project, no further duplicate samples are necessary. Additionally, with the small scope of this project, no field blanks, trip blanks, or equipment blanks will be collected.

Quality control of the laboratory analyses will be conducted in accordance with the contract laboratory's QC program and procedures and will include laboratory duplicates and matrix spikes.

5. Shipment of Samples

The samples will be placed in the appropriately labeled containers with the completed Chain of Custody and shipped in an insulated container with ice via an overnight courier to the contact laboratory for analyses.

6. Sample Analyses

The samples collected as a part of this study will be analyzed for the list of compounds indicated in Attachment B. At the time of the development of this protocol, the selected contract laboratory did not have standards and/or validated methods developed for the additional perfluoridated chemicals (PFCs) noted in the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. As such, the list of compounds indicated in Attachment B reflects the full current analytical capabilities of the contract laboratory with respect to PFCs.

The concentrations of these chemicals will be determined utilizing the contract laboratory's method for analyses. The method will be provided to Dalton Utilities by the contract laboratory in the subsequent analytical report.

7. Schedule

The sampling events delineated herein will be initiated no later than 30 days after Dalton Utilities receives EPA's approval of this plan. Samples will be collected at approximately four month intervals. The sampling may be discontinued or the schedule adjusted if the compost is thermally treated.

8. Reporting

The analytical report for this project will be provided to Dalton Utilities upon completion and verification of the analyses by the contract laboratory. Dalton Utilities will submit the analytical sample results to EPA within 5 days of receipt of the final analytical report in accordance with the Clean Water Act (CWA)

Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. Additionally, a full report including all analytical results will be provided to EPA once all the final analytical results are received.

Chain of Custody Record

Temperature on Receipt _____

Drinking Water? Yes ☐ No ☐

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

TAL-4124-280 (1007)

Client: Client Name	Project Manager: Your Field Rep or Project Manager	Date: Date of Sampling	Chain of Custody Number: 104321
Address: Client Address	Telephone Number (Area Code)/Fax Number: Same AS Above	Lab Number	Page _____ of 8 of
City / State / Zip Code	Site Contact	Lab Contact: your T.A. Project MGR	
Project Name and Location (State): ABC Landfill - Denver, CO	Carrier/Waybill Number		
Contract/Purchase Order/Quote No.: Quote # 12345			

Sample I.D. No. and Description (Containers for each sample may be combined on one line)	Date	Time	Matrix: Air	Aqueous	Sed.	Soil	Containers & Preservatives: Unpres.	H2SO4	HNO3	HCl	NaOH	ZnAc/ NaOH	Analysis: BOD	TSS, TDS	Oil & Grease	total Metals	8260 Voa	Cyanide	Sulfide	Flash point	% Moisture	Special Instructions/ Conditions of Receipt
MW-1	8/20/08	0930		X			3	2	1	3	1	1	X	X	X	X	X	X	X			★ Any Special
MW-2	8/20/08	1055		X					1	3						X	X					Information you
MW-3	8/20/08	1345				X	3									X	X			X	X	May want the
																						Lab to know
																						Examples
																						- MS/MSD
																						- High in PCBs
																						- Limited Volume

Attachment A

Possible Hazard Identification
☐ Non-Hazard ☐ Flammable ☐ Skin Irritant ☐ Poison B ☐ Unknown

Sample Disposal
☐ Return To Client ☐ Disposal By Lab ☐ Archive For _____ Months (A fee may be assessed if samples are retained longer than 1 month)

Turn Around Time Required
☐ 24 Hours ☐ 48 Hours ☐ 7 Days ☐ 14 Days ☐ 21 Days ☒ Other STD

QC Requirements (Specify)

1. Relinquished By: Sign Here to Identify Sample Transfer	Date	Time	1. Received By: We Sign Here upon Arrival	Date	Time
2. Relinquished By	Date	Time	2. Received By	Date	Time
3. Relinquished By	Date	Time	3. Received By	Date	Time

Comments: Shipped VIA FEDEX Priority Overnight

DISTRIBUTION: WHITE - Returned to Client with Report; CANARY - Stays with the Sample; PINK - Field Copy

Attachment A to November 2, 2008 Letter to Ms. Mitchell

Attachment B

List of Perfluoridated Compounds (PFC) for Chemical Analyses

As Revised June 17, 2009, by EPA

Compound	Acronym
Perfluorobutanoic acid	C4
Perfluoropentanoic acid	C5
Perfluorohexanoic acid	C6
Perfluoroheptanoic acid	C7
Perfluorooctanoic acid	C8
Perfluorononanoic acid	C9
Perfluorodecanoic acid	C10
Perfluoroundecanoic acid	C11
Perfluorododecanoic acid	C12
Perfluorotridecanoic acid	C13
Perfluorotetradecanoic acid	C14
Perfluorobutane sulfonate	PFBS
Perfluorohexane sulfonate	PFHxS
Perfluorooctane sulfonate	PFOS
Perfluoroctane sulfonamide	PFOSA